

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ROBERT MARTIN, as Personal Representative
of the Estate of DARLENE MARTIN, a Protected Person,

Plaintiff,

vs.

MICHIGAN DEPARTMENT OF
CORRECTIONS, et al,

Defendants.

Case No. 2:17-cv-11845
Hon. David M. Lawson
Magistrate Judge Stephanie
Dawkins Davis

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**DEFENDANTS MHM CORRECTIONAL SERVICES, INC.,
MHM SERVICES, INC. AND VINCENT PERNELL, M.D.'S
CONCURRENCE AND JOINDER IN THE CORIZON DEFENDANTS'
EMERGENCY MOTION \FOR RELIEF FROM ORDER (DKT. 259)**

Defendants, MHM CORRECTIONAL SERVICES, INC., MHM SERVICES, INC. and VINCENT PERNELL, M.D. (hereinafter “MHM Defendants”, by and through their attorneys, **RUTLEDGE, MANION, RABAUT, TERRY & THOMAS, P.C.**, and concur and join in the Corizon Defendants’ Emergency Motion for Relief from Order with respect to the Court’s October 3, 2019 Order (Dkt. #255) requiring Defendants to pay Plaintiff the agreed upon settlement monies by October 9, 2019.

The MHM Defendants further state that a Stipulation and Order to Lift Stay of Proceedings of the Washtenaw County Circuit Court action, along with a Stipulation and Order of Dismissal have been sent to Judge Carol Kuhnke for entry. The MHM Defendants have the settlement check in its possession but seek a dismissal of the Circuit Court action prior to providing the check to Plaintiff’s counsel.

WHEREFORE, the MHM Defendants concur and join in the Corizon Defendants’ Emergency Motion for Relief from Order, and request that the Court amend its October 3, 2019 Order by vacating the deadline for payment of the settlement monies until a dismissal of the Washtenaw County Circuit Court action has been entered.

Respectfully submitted,

RUTLEDGE, MANION, RABAUT,
TERRY & THOMAS, P.C.

/Dale A. Robinson

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Dated: October 8, 2019.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of October, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

I declare that the statements above are true to the best of my information, knowledge and belief.

/s/ Linda S. Haller